

Exhibit G

Lacy, Michael E.

From: McFarland, Robert W. <rmcfarland@mcguirewoods.com>
Sent: Tuesday, January 21, 2020 3:09 PM
To: Lacy, Michael E.
Cc: Wingfield, Alan D.; Lynch, John C.; Monica McCarroll; Hatch, Benjamin L.; Noonan, Jeanne E.; Peterson, Ashley P.
Subject: RE: CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al

EXTERNAL SENDER

Michael:

Thank you for your timely response. We agree that it would be helpful to have a further call in the near future, after we have had a chance to speak further with our client, about the data and information that is going to be provided. We continue to work on production of our responsive documents and expect to make a further production within a week. We are unable to provide a specific date by which we can provide the information you requested, though, in large part because we are still discussing with our client, and grappling with, the scope of some of NSR's requests, including the new broadly expanded geographic terms.

At this juncture, we believe it is best for us to pursue relief from the present expert and discovery deadlines through the Court. We trust you agree the parties have satisfied the meet and confer requirement on this matter, but if you disagree, please let me know. Best Rob McFarland

From: Lacy, Michael E. <Michael.Lacy@troutman.com>
Sent: Tuesday, January 21, 2020 12:43 PM
To: McFarland, Robert W. <rmcfarland@mcguirewoods.com>
Cc: Wingfield, Alan D. <Alan.Wingfield@troutman.com>; Lynch, John C. <john.lynch@troutman.com>; Monica McCarroll <MMcCarroll@redgravellp.com>
Subject: RE: CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al

****EXTERNAL EMAIL; use caution with links and attachments****

Rob—

Sorry I was not on the meet and confer earlier this morning. Monica said that you asked if NS's position on the expert report extension issue remains the same. We may be willing to change our position if CSXT could provide a date by which it would provide the specific information requested. Can you provide that? Also, we should set up a call to make sure the parties are on the same page in terms of the data they are providing, given our understanding that both railroads use the same program/system.

Thanks.

Michael E. Lacy

troutman sanders

Direct: 804.697.1326

michael.lacy@troutman.com

From: McFarland, Robert W. <rmcfarland@mcguirewoods.com>
Sent: Friday, January 17, 2020 1:03 PM
To: Lacy, Michael E. <Michael.Lacy@troutman.com>; Connell Mullins <cmullins@spottsfain.com>; 'Spivey, W. Edgar' <wespivey@kaufcan.com>; Winn, Kathryn Y. <KWinn@mcguirewoods.com>; jchapman@cwm-law.com; wrsnow@cwm-

law.com; ddavenport@cwm-law.com; dhartnett@cwm-law.com; Wingfield, Alan D. <Alan.Wingfield@troutman.com>; Belote, Clark J. <cjbelote@kaufcan.com>; Flowers, Elizabeth Spain <Liz.Flowers@troutman.com>; Lynch, John C. <john.lynch@troutman.com>; Knudsen, Kathleen M. <Kathleen.Knudsen@troutman.com>; mmccarroll@redgravellp.com; Hugh Fain <hfain@spottsfain.com>; John Erbach <jerbach@spottsfain.com>
Cc: Stephanie Hunter <shunter@cwm-law.com>; Armond Joyner <ajoyner@cwm-law.com>
Subject: RE: CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al

EXTERNAL SENDER

Michael: CSX is not willing to condition the 15 day extension on it providing to NS by 1/24/20 the documents you outlined below. CSX is diligently working on its document production and will produce as quickly as feasible, but the extension was never intended or discussed as a "quid pro quo" document exchange and we cannot agree to make it so now. As stated previously, the parties' discovery and expert timetables and deadlines are significantly different. Would NS be willing to give CSX the same deadlines it has for discovery and experts; if it will, we can then file an agreed motion and proposed Order to amend the Scheduling conference instead of an extension request. If not, please advise whether NS will withdraw its quid pro quo requirement and agree to the 15 day extension and production of the designated documents by 1/24 and 1/31, by COB today. Thank you. Rob

From: McFarland, Robert W.

Sent: Friday, January 17, 2020 9:36 AM

To: 'Lacy, Michael E.' <Michael.Lacy@troutman.com>; Connell Mullins <cmullins@spottsfain.com>; 'Spivey, W. Edgar' <wespivey@kaufcan.com>; Winn, Kathryn Y. <KWinn@mcguirewoods.com>; jchapman@cwm-law.com; wrsnow@cwm-law.com; ddavenport@cwm-law.com; dhartnett@cwm-law.com; Wingfield, Alan D. <Alan.Wingfield@troutman.com>; Belote, Clark J. <cjbelote@kaufcan.com>; Flowers, Elizabeth Spain <Liz.Flowers@troutman.com>; Lynch, John C. <john.lynch@troutman.com>; Knudsen, Kathleen M. <Kathleen.Knudsen@troutman.com>; mmccarroll@redgravellp.com; Hugh Fain <hfain@spottsfain.com>; John Erbach <jerbach@spottsfain.com>
Cc: Stephanie Hunter <shunter@cwm-law.com>; Armond Joyner <ajoyner@cwm-law.com>
Subject: RE: CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al

Michael: we will discuss NS's new condition with our client and advise you of our position on it ASAP. I note this is a new condition, not discussed yesterday. As the plaintiff, under the Scheduling Order, CSXT is the party with the fast approaching expert disclosure deadline and discovery cutoffs that can't be met, because of NS's failure to produce critical documents. Defendants are 30 days behind us, as you are aware.

I do not expect this condition will be well received by CSXT, but we will discuss it with them. I would ask NS reconsider this condition. Rob

From: Lacy, Michael E. <Michael.Lacy@troutman.com>

Sent: Friday, January 17, 2020 9:24 AM

To: McFarland, Robert W. <rmcfarland@mcguirewoods.com>; Connell Mullins <cmullins@spottsfain.com>; 'Spivey, W. Edgar' <wespivey@kaufcan.com>; Winn, Kathryn Y. <KWinn@mcguirewoods.com>; jchapman@cwm-law.com; wrsnow@cwm-law.com; ddavenport@cwm-law.com; dhartnett@cwm-law.com; Wingfield, Alan D. <Alan.Wingfield@troutman.com>; Belote, Clark J. <cjbelote@kaufcan.com>; Flowers, Elizabeth Spain <Liz.Flowers@troutman.com>; Lynch, John C. <john.lynch@troutman.com>; Knudsen, Kathleen M. <Kathleen.Knudsen@troutman.com>; mmccarroll@redgravellp.com; Hugh Fain <hfain@spottsfain.com>; John Erbach <jerbach@spottsfain.com>
Cc: Stephanie Hunter <shunter@cwm-law.com>; Armond Joyner <ajoyner@cwm-law.com>
Subject: RE: CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al

EXTERNAL EMAIL; use caution with links and attachments

Rob—

NSR is agreeable to your proposal, with the caveat that we need assurances that CSXT will provide the same documents by the same dates, and in a mutually agreeable format for the production of data from non-custodial data sources.

Per Ben's letter of January 14, CSXT agreed to provide these documents, which are requested by NSR's RFP Nos. 39, 1 (second set), 31-32, 46-48, 55, and 64-67. We are willing to meet and confer early next week to ensure we are exchanging matching non-custodial data.

If needed, we can discuss on our 4:30 call this afternoon. Thanks.

Michael E. Lacy

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Direct: 804.697.1326

michael.lacy@troutman.com

From: McFarland, Robert W. <rmcfarland@mcguirewoods.com>

Sent: Friday, January 17, 2020 9:22 AM

To: Connell Mullins <cmullins@spottsfain.com>; 'Spivey, W. Edgar' <wespivey@kaufcan.com>; Winn, Kathryn Y. <KWinn@mcguirewoods.com>; jchapman@cwm-law.com; wrsnow@cwm-law.com; ddavenport@cwm-law.com; dhartnett@cwm-law.com; Wingfield, Alan D. <Alan.Wingfield@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Belote, Clark J. <cjbelote@kaufcan.com>; Flowers, Elizabeth Spain <Liz.Flowers@troutman.com>; Lynch, John C. <john.lynch@troutman.com>; Knudsen, Kathleen M. <Kathleen.Knudsen@troutman.com>; mmccarroll@redgravellp.com; Hugh Fain <hfain@spottsfain.com>; John Erbach <jerbach@spottsfain.com>

Cc: Stephanie Hunter <shunter@cwm-law.com>; Armond Joyner <ajoyner@cwm-law.com>

Subject: RE: CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al

EXTERNAL SENDER

Thanks, appreciate it. I just need to hear from NS.

From: Connell Mullins <cmullins@spottsfain.com>

Sent: Friday, January 17, 2020 9:04 AM

To: 'Spivey, W. Edgar' <wespivey@kaufcan.com>; McFarland, Robert W. <rmcfarland@mcguirewoods.com>; Winn, Kathryn Y. <KWinn@mcguirewoods.com>; jchapman@cwm-law.com; wrsnow@cwm-law.com; ddavenport@cwm-law.com; dhartnett@cwm-law.com; alan.wingfield@troutmansanders.com; michael.lacy@troutmansanders.com; Belote, Clark J. <cjbelote@kaufcan.com>; liz.flowers@troutmansanders.com; john.lynch@troutmansanders.com; kathleen.knudsen@troutmansanders.com; mmccarroll@redgravellp.com; Hugh Fain <hfain@spottsfain.com>; John Erbach <jerbach@spottsfain.com>

Cc: Stephanie Hunter <shunter@cwm-law.com>; Armond Joyner <ajoyner@cwm-law.com>

Subject: RE: CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al

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Rob,

I did not participate in the call yesterday, but my understanding was that John Erbach agreed to the modified request on behalf of Hall, Merilli, and Hurlbut. In any event, we do agree.

Thanks.

Connell

Connell Mullins

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From: Spivey, W. Edgar <wespivey@kaufcan.com>

Sent: Friday, January 17, 2020 8:40 AM

To: McFarland, Robert W. <rmcfarland@mcguirewoods.com>; Winn, Kathryn Y. <KWinn@mcguirewoods.com>; jchapman@cwm-law.com; wrsnow@cwm-law.com; ddavenport@cwm-law.com; dhartnett@cwm-law.com; alan.wingfield@troutmansanders.com; michael.lacy@troutmansanders.com; Belote, Clark J. <cjbelote@kaufcan.com>; liz.flowers@troutmansanders.com; john.lynch@troutmansanders.com; kathleen.knudsen@troutmansanders.com; mmccarroll@redgravellp.com; Hugh Fain <hfain@spottsfain.com>; Connell Mullins <cmullins@spottsfain.com>; John Erbach <jerbach@spottsfain.com>

Cc: Stephanie Hunter <shunter@cwm-law.com>; Armond Joyner <ajoyner@cwm-law.com>

Subject: [External Sender] RE: CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al

Rob – I thought we had already agreed on behalf of Moss. We agree.

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From: McFarland, Robert W. [<mailto:rmcfarland@mcguirewoods.com>]

Sent: Friday, January 17, 2020 8:34 AM

To: Winn, Kathryn Y. <KWinn@mcguirewoods.com>; jchapman@cwm-law.com; wrsnow@cwm-law.com; ddavenport@cwm-law.com; dhartnett@cwm-law.com; alan.wingfield@troutmansanders.com; michael.lacy@troutmansanders.com; Spivey, W. Edgar <wespivey@kaufcan.com>; Belote, Clark J. <cjbelote@kaufcan.com>; liz.flowers@troutmansanders.com; john.lynch@troutmansanders.com; kathleen.knudsen@troutmansanders.com; mmccarroll@redgravellp.com; hfain@spottsfain.com; cmullins@spottsfain.com; jerbach@spottsfain.com

Cc: Stephanie Hunter <shunter@cwm-law.com>; Armond Joyner <ajoyner@cwm-law.com>

Subject: RE: CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al

Counsel: Other than Ryan, on behalf of NPBL, I have not heard from the rest of the defendants on our modified request to a 15 day extension, conditioned upon NS's and NPBL's agreements to provide certain documents by 1/24 and 1/31. Please advise me immediately if you agree or not with the modified extension request, and for NS, whether it agrees to make the requested productions by 1/24 and 1/31. We will construe any party's silence as a non-agreement to the extension, and will move the Court to extend, on an expedited basis. Thank you. Rob

From: Winn, Kathryn Y. <KWinn@mcguirewoods.com>

Sent: Thursday, January 16, 2020 2:18 PM

To: jchapman@cwm-law.com; wrsnow@cwm-law.com; ddavenport@cwm-law.com; dhartnett@cwm-law.com; alan.wingfield@troutmansanders.com; michael.lacy@troutmansanders.com; wespivey@kaufcan.com; cjbelote@kaufcan.com; liz.flowers@troutmansanders.com; john.lynch@troutmansanders.com; kathleen.knudsen@troutmansanders.com; mmccarroll@redgravellp.com; hfain@spottsfain.com; cmullins@spottsfain.com; jerbach@spottsfain.com

Cc: McFarland, Robert W. <rmcfarland@mcguirewoods.com>; Stephanie Hunter <shunter@cwm-law.com>; Armond Joyner <ajoyner@cwm-law.com>

Subject: CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al

Please see the attached correspondence from Rob McFarland.

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